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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications

Docket No. MC96-3

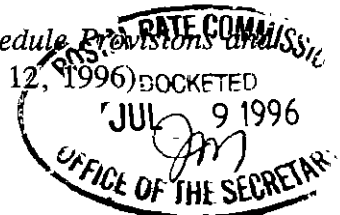
COMMENTS OF
THE NEWSPAPER ASSOCIATION OF AMERICA
ON PROPOSED SPECIAL RULES OF PRACTICE
(July 9, 1996)

The Newspaper Association of America ("NAA"), pursuant to Order No. 1115,¹ hereby submits its comments on the proposed special rules of practice in this proceeding. NAA's comments are limited to the proposed rule regarding electronic filing and service of documents.

Counsel for NAA has experienced inconveniences with the e-mail service procedures established in Docket No. MC96-2. While NAA has had little trouble with the electronic filing of documents with the Commission, it has encountered problems in effecting electronic service on other parties. In general, these problems have arisen from certain incompatibilities between e-mail software, and has required extra efforts to effect service on certain parties. At this point, counsel for NAA has concluded that, at least insofar as proceedings before this agency are concerned, hardcopy service is preferable.

NAA would suggest that the Commission amend its electronic filing and service rules to include a new option. Under the new option, parties would file an original and

¹ Notice of Request for Changes in Domestic Mail Classification Schedule Provisions and Rates for Special Services and Order Instituting Proceedings (issued June 12, 1996)



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one hard copy of each filing, and e-mail (rather than file a diskette) the text of the filing to the Dockets room. Counsel would mail a copy of the document to all parties, and receive service by other parties via Postal Service delivery. A possible variation of this option would be for the Commission to e-mail the text to other parties (this alternative would merely constitute a modest variation of option 2). In neither case would the party itself attempt to e-mail a document to other parties.

Accordingly, NAA respectfully urges the Commission to modify the rules for electronic service in the manner proposed. However, if the e-mail filing and service rule is adopted as proposed in Order 1115, NAA would opt for option 1.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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July 9, 1996

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Certificate of Service

I hereby certify that I have this 9th day of July, 1996, served the foregoing document upon the United States Postal Service in accordance with sections 12 and 20(c) of the rules of practice.


William B. Baker